

# REDACTED DOCUMENT

Docket # 2

Date Filed:

6/27/12

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United States District Court  
District of New Jersey

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UNITED STATES OF AMERICA

v.

Vladimir Drinkman

a/k/a

a/k/a

a/k/a

a/k/a

: Hon. Michael A. Shipp

: Magistrate No. 12-6103

: **CRIMINAL COMPLAINT**

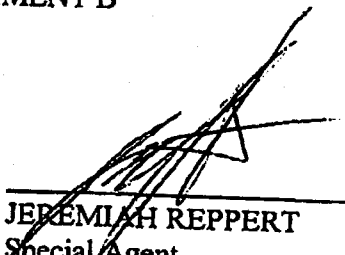
: **FILED UNDER SEAL**

I, Jeremiah Reppert, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief.

SEE ATTACHMENT A

I further state that I am a Special Agent with the United States Secret Service, and that this complaint is based on the following facts:

SEE ATTACHMENT B

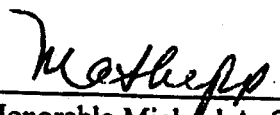
  
\_\_\_\_\_  
JEREMIAH REPERT  
Special Agent  
United States Secret Service

Sworn to before me and subscribed in my presence,

July 27, 2012  
Date

at 7:40 PM

Newark, New Jersey  
City and State

  
\_\_\_\_\_  
Honorable Michael A. Shipp  
United States Magistrate Judge

**ATTACHMENT A**

Between in or about December 2003 and in or about August 2005, in Morris County, in the District of New Jersey; and elsewhere, defendant

Vladimir Drinkman,

a/k/a

a/k/a

a/k/a

a/k/a

did knowingly and intentionally conspire and agree with others to:

(1) having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises, transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, any writings, signs, signals, pictures, and sounds for the purpose of executing such scheme or artifice in a manner affecting a financial institution, contrary to Title 18, United States Code, Section 1343; and

(2) execute a scheme and artifice to defraud financial institutions, and to obtain the moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, financial institutions, by means of materially false and fraudulent pretenses, representations, and promises, contrary to Title 18, United States Code, Section 1344.

In violation of Title 18, United States Code, Section 1349.

**ATTACHMENT B**

I, Jeremiah Reppert, am a Special Agent with the United States Secret Service ("Secret Service"). Based upon my investigation, my review of investigative reports, and my discussions with other individuals involved in this investigation, I have knowledge of the facts below. I describe statements attributed herein to individuals in substance and in part.

1. At all times relevant to this Complaint:

a. Defendant VLADIMIR DRINKMAN, a/k/a a/k/a a/k/a  
' a/k/a (hereinafter "DRINKMAN") was a citizen of Russia residing  
in or near Moscow.

b. DRINKMAN communicated over the ICQ instant messaging service using the account number 11828558.

c. Citibank and Wells Fargo were "financial institutions" within the meaning of Title 18, United States Code, Section 20.

2. Between in or about October 2002 and in or about September 2004, Dumpsmarket was an online trading forum which promoted and facilitated a wide variety of criminal activities including, among others, electronic theft of personal identifying information, payment card fraud, and the production and sale of false identification documents for the purpose of withdrawing stolen funds from bank and credit card accounts.

3. Dumpsmarket's websites, dumpsmarket.com, dumpsmarket.cc, dumpsmarket.cn, and dumpsmarket.ws facilitated the commission of the above-referenced crimes by enabling the discussion and trading of information. A primary purpose of the site was to serve as a business platform for the sale of dumps and counterfeit passports by an individual identified herein as S.P. Dumpsmarket's English-language forums included such topic areas as the following: credit card dumps, social security number trading, hacking, hacking services, and spam.

4. In or about August 2004, the Secret Service obtained an image of the Dumpsmarket forums, which were hosted on a server located in Parsippany, New Jersey.

5. In or about September 2004, S.P. was arrested by Belarussian authorities for fraud in excess of \$1,000,000. S.P.'s computer was seized as part of the arrest. S.P. identified two individuals as providing him with payment card account numbers in Track 2 format<sup>1</sup>. Among the two individuals was defendant DRINKMAN, using the alias

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<sup>1</sup>Based on my training and experience, I am aware that the magnetic stripe used by credit and debit cards to store data is made up of three separate tracks. Each track stores unique data. Tracks one and two are most commonly used for financial transactions, such as ATM machines and point of sale terminals. Track two includes an account holder's primary account number, expiration date, and service code, among other things.

6. The Secret Service was able to decrypt data on S.P.'s computer. The data revealed ICQ communications between S.P. and DRINKMAN, using the alias Analysis of the ICQ communications reveals that DRINKMAN provided S.P. with Track 2 credit card data.

7. Analysis of S.P. drives further revealed that S.P. was communicating with DRINKMAN using DRINKMAN's ICQ number, 11828558. For example, between February 2003 and March 2003, DRINKMAN provided S.P. with over 500 separate credit card numbers, including numbers from Citibank and Wells Fargo.

8. Russian law enforcement has further identified that DRINKMAN is defendant